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Attorneys for Plaintiff
Charles Singer

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHARLES SINGER,

Plaintiff,

v.

R.C. WILLEY HOME FURNISHINGS;
RICHLAND HOLDINGS, INC. d/b/a
ACCTCORP OF SOUTHERN NEVADA;
EXPERIAN INFORMATION SOLUTIONS,
INC.; and TRANS UNION LLC,

Defendants.

Case No.: 2:22-cv-00291-JCM-EJY

**JOINT STIPULATION AND ORDER
STAYING DISCOVERY**

(First Request)

IT IS HEREBY STIPULATED by and between Plaintiff Charles Singer ("Plaintiff") and Defendants R.C. Willey Home Furnishings ("RC Willey") and Richland Holdings, Inc. d/b/a AcctCorp of Southern Nevada ("ACSN," and together with Plaintiff and RC Willey, the "Parties"), through their respective attorneys of record, state as follows:

1 That Plaintiff initiated this action by filing a Complaint on February 16, 2022 alleging that
2 ACSN and RC Willey violated the Fair Credit Reporting Act and that ACSN violated the Fair
3 Debt Collection Practices Act (ECF No. 1). On April 13, 2022, ACSN filed a Motion to Dismiss
4 Plaintiff's Complaint (ECF No. 21);

5 Counsel for the Parties conducted a Fed. R. Civ. P. 26(f) conference and filed a Joint
6 Proposed Discovery Plan and Scheduling Order on April 29, 2022 (ECF No. 24). On April 29,
7 2022, the Court entered the Parties' proposed scheduling order (ECF No. 25).

8 On May 23, 2022, Plaintiff served written discovery requests on Defendants, and each
9 party has responded to Plaintiff's discovery;

10 To conserve the resources of the Court and the Parties and to promote efficiency, the
11 Parties stipulate and agree that it is appropriate to stay further discovery and all other pre-trial and
12 trial deadlines pending a ruling on ACSN's Motion to Dismiss, the outcome of which is likely to
13 affect the defenses of all defendants. The Parties further stipulate and agree that no party will be
14 prejudiced by the requested stay.

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Based on their Stipulation, and to ensure that they are not bound by the dates set forth in the Scheduling Order (ECF No. 25), the Parties request that the Court enter an order staying all discovery pending a ruling on ACSN's Motion to Dismiss. The parties agree that, if the Motion to Dismiss is denied, the parties will promptly submit a new proposed discovery plan and scheduling order.

Respectfully submitted this 30th day of June 2022.

By: /s/ Youssef H. Hammoud

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Attorney for Defendant

Richland Holdings, Inc.

d/b/a Acctcorp Of Southern Nevada

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: June 30, 2022